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U.S. Army Toxic and Hazardous Materials Agency

Report of Sampling and Analysis Results

Addison Army Housing Units Addison, Illinois

September 1990



Prepared for:

U.S. ARMY TOXIC AND HAZARDOUS MATERIALS AGENCY Aberdeen Proving Ground Maryland 21010-5401

Prepared by:



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SAMPLING AND ANALYSIS AT THE U.S. ARMY FAMILY HOUSING UNIT (FHU) PROPERTY ADDISON, ILLINOIS

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EXECUTIVE SUMMARY

The U.S. Army family housing units (FHUs) at Addison, Illinois were inspected by Roy F. Weston, Inc. (WESTON) personnel during February 1990 to further evaluate the environmental concerns identified in the enhanced Preliminary Assessment reports prepared and submitted earlier by Argonne National Laboratory (ANL) for the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA). Three of the 12 single-family "Capehart" housing units were examined on 27 February to investigate the possible presence of asbestos-containing materials (ACM). Transformers were inspected on 20 March 1990.

The ANL Draft Sampling and Analysis Plan, Revision 1 (SAP) specified sampling the following materials, where present, which are suspected to contain asbestos, from ten per cent of the housing units or a minimum of three housing units, whichever is greater.

- Pipe run insulation.
- Dust accumulated inside heating ductwork within the concrete slab, where present and open.
- Vinyl floor tiles.

The WESTON personnel selected three housing units for inspection after review of maintenance records and drawings, discussions with housing management personnel, and determination that the units were in similar condition. The housing units chosen, Nos. 001, 005, and 006, were considered to be representative of the other nine units, but this was not confirmed by an examination of all the units.

Twelve dust samples and eight samples of floor tile and vinyl sheeting were collected by WESTON and analyzed. These analyses revealed that asbestos is present in dust accumulated within the heating ductwork and in floor tile and vinyl sheeting at the three housing units examined. Asbestos was found in nine of the twelve dust samples by transmission electron microscopy (TEM), and in at least two samples from each unit. Asbestos was quantified at 7% or greater by polarized light microscopy (PLM) in two of the floor tile and vinyl sheeting samples and quantified at less than 1% in three additional samples. Three other samples were qualitatively identified by TEM. No pipe insulation samples were collected since the pipes in the units examined were not insulated. During the asbestos sampling activity, other suspect materials observed were roofing materials.

The following practices should be observed with regard to the known and suspected asbestos-containing materials identified:

The risks posed by the asbestos-containing dust in the ductwork cannot be clearly evaluated, because the sampling and analysis program only included a qualitative screening of this material since no approved quantitative procedure exists. Further studies, such as air sampling, are recommended to determine if the asbestos is becoming airborne and to define what risks, if any, are presented by these findings. These studies could not be performed at this facility as a part of the follow-up effort because there was no vacant unit at that time.

- The vinyl floor coverings pose no significant risk as long as they are in good condition and are not damaged by excessive wear or misuse. They should be managed in place under an Operations and Maintenance (O&M) program which describes procedures for the regular inspection of the floor coverings and the removal and replacement of any that become damaged.
- Other suspect materials identified but not sampled, including roofing materials, should be assumed to contain asbestos and managed in place under an O&M program until they are either removed or determined to contain no asbestos.

Four Army-owned transformers that may contain PCBs were identified at the Addison site. One of the transformers appeared to be in a condition that would have permitted an attempt to collect a sample. The condition of the other three devices was such that the sampling could not be safely performed. No sample was obtained from the sound unit after the WESTON team waited for over four hours for assistance from the Commonwealth Edison support personnel. WESTON concludes that the transformers are likely to belong to the PCB-transformer category based on their age. These transformers should be assumed to contain PCBs, based on their age. This fact should be noted in facility records and the devices should be labeled appropriately. Since the transformers are old and their housing are deteriorating, they should be checked periodically as long as they are in service to ensure that no leaks have developed. When the units are ultimately removed, they should be transported to a location where they can be safely sampled. A proper area should be capable of containing any oils that may be spilled during the opening and sampling of the transformers until the residues can be cleaned up satisfactorily. The findings of this sampling program should be used to determine the proper disposal method.



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SECTION 1. INTRODUCTION

SAMPLING AND ANALYSIS AT THE U.S. ARMY FAMILY HOUSING UNIT (FHU) PROPERTY ADDISON, ILLINOIS

SECTION 1. INTRODUCTION

Roy F. Weston, Inc. (WESTON) was retained by Argonne National Laboratory (ANL) to provide assistance in gathering additional environmental data for the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) at 53 family housing unit (FHU) properties in 12 states. The Addison, Illinois property is one of these FHUs.

1.1 PURPOSE AND SCOPE

The purpose of this project was to provide the Department of the Army with sound environmental data on the properties which are scheduled for sale or realignment as a result of the Defense Authorization Amendments and Base Closure and Realignment Act (Public Law 100-526). Environmental assessments of each property covered by the Act are required by the Secretary of Defense prior to their closure or realignment. Such actions must be performed in accordance with applicable provisions of the National Environmental Policy Act (NEPA) to ensure that any environmental hazards will be identified and mitigated where required.

Previously, ANL conducted enhanced preliminary assessments (PAs) for each property. These enhanced PAs made recommendations regarding sampling and analysis to determine (1) whether and in what quantities asbestos is present in certain building construction materials (including pipe run insulation, dust accumulated in heating ductwork, vinyl floor tile, and exterior siding shingles, where present), (2) in selected contexts, whether and in what concentration soils and groundwater may be contaminated, and (3) whether and in what range transformer oils at selected sites may contain polychlorinated biphenyls (PCBs). WESTON gathered this data by implementing ANL's Draft FHU Sampling and Analysis Plan, Revision 1 (SAP).

1.2 SITE DESCRIPTION

The Department of the Army's FHU property in Addison, Illinois consists of 12 single-family housing units located on 5.01 acres. The units are immediately surrounded by other residential properties. Addison is a western suburb of Chicago and is located in Du Page County

The three-bedroom "Capehart"-style single-family housing units were constructed in 1958. The single-story, wood-frame units were built on concrete slab foundations with no basements or crawl spaces. The ducts for the original heating system and domestic water lines were embedded in the concrete slab, which was covered with vinyl floor coverings. The units have pitched roofs surfaced with asphalt shingles and exteriors finished with wood siding.

1.3 REPORT ORGANIZATION

This report contains the results of the sampling and analysis program performed by WESTON. Section 2 contains a description of the asbestos sampling performed at the property and laboratory results for samples of suspected asbestos-containing material (ACM) collected. Copies of field notes and laboratory results pertaining to asbestos are provided in Appendices A.1 and A.2. Section 3 contains a description of field activities and the findings from the transformer evaluations. Copies of field notes and supporting data for this effort are included in Appendix B. Section 4 is a summation of all activities and findings for the Addison, Illinois site.

SECTION 2. ASBESTOS-CONTAINING MATERIALS

SECTION 2. ASBESTOS-CONTAINING MATERIALS

WESTON personnel inspected three of the 12 "Capehart" units at the Addison family housing facility on 27 February 1990 for the presence of suspected ACM. Vinyl floor tile, vinyl sheeting, and dust accumulated within the heating ductwork were the only suspect materials found within the buildings that were sampled. All sampling was done following the requirements of ANL's SAP. Additionally, all field work was performed in accordance with applicable Federal regulations, including 40 CFR Part 61 Subpart M, 40 CFR Part 763 Subpart E, and 29 CFR Part 1910.1001.

2.1 SAMPLING RATIONALE

The sampling rationale used by WESTON for this project followed the recommendations set forth by ANL. The type of suspect ACM to be sampled, the number of housing units to be examined at each FHU facility, and number of samples to be taken for each material found were described in the SAP. The plan for Addison required sampling of the following materials, if present:

- Pipe run insulation.
- Accumulated dust inside heating ductwork if not sealed.
- Vinyl floor tiles.

In accordance with the SAP, three units were examined at this facility. The sampling plan, however, did not identify specific units which were to be sampled. The task of determining which housing units were representative of the facility as a whole and, therefore, would be sampled was left to the WESTON field team. After reviewing all available maintenance records and drawings and discussing the facility with Directorate of Engineering and Housing (DEH) personnel, it was determined that all of the units at the Addison FHU were similar in condition. Units 001, 005, and 006 were chosen by the WESTON field team leader as representative units to be sampled, based on availability of occupants to permit sampling.

The SAP specifies that a minimum of two pipe run insulation samples, four dust samples, and one sample of each color of floor tile be collected from each of the housing units examined. Twelve dust samples and eight samples of vinyl floor coverings were collected at the facility. No pipe insulation samples were collected since the pipes in the units examined were not insulated.

2.2 FIELD ACTIVITIES AND OBSERVATIONS

Each of the units was inspected to determine if suspect materials were present. Heating ductwork vents in the units were not sealed, so dust samples were collected by wiping the inner surface of the duct near the designated exhaust vents with a fiber-free wipe selected for its ability to trap dust in a non-fibrous matrix. Each wipe was placed in the jaws of a flexible small parts pick-up tool and moistened with fiber free water. The grille was then removed and the tool inserted into the duct opening. The interior surface was wiped to collect dust on the moistened surface of the wipe. After the dust was gathered, the wipe was placed in a small plastic wide-mouth jar, sealed, labeled with the sample number, and shipped to the lab. The grille was then replaced and the tool was cleaned by rinsing and wet wiping the surfaces prior to collecting the next sample. Samples were collected from the living room, kitchen, bedroom, and main bathroom in all three units.

Black 9" x 9" floor tile, gray and brown 12" x 12" floor tile, and white and brown floor tile of unknown size, were sampled. Units 005 and 006 contained brown 12" x 12" floor tile. Unit 006 also contained gray 12" x 12" floor tile. Unit 001 contained black 9" x 9" floor tile, brown vinyl sheeting, and gray vinyl sheeting which covered the white and brown floor tile. The size of this bottom layer could not be determined without removal of a portion of the upper layer, but it was probably 9" x 9", based on findings elsewhere. One sample of each of the floor tile and vinyl sheeting types was taken in each housing unit, resulting in a total of eight samples for laboratory determination of asbestos content. These samples were taken by breaking off a small piece of floor tile in an inconspicuous location. About one square inch of the tile surface area was taken for each sample. No effort was made to separate the mastic, which sometimes contains asbestos, from the floor tile samples themselves.

The vinyl floor covering in all three of the units inspected was in good condition. This material is considered to be a non-friable type of ACM, unless damaged. If significant damage occurs, such that the material becomes friable as defined in the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), the U. S. Environmental Protection Agency (EPA) would classify these tiles as friable materials. However, an EPA interpretation was recently released that changes certain previous interpretations regarding non-friable ACM. On 23 February 1990, a memorandum was issued by the Director of Emissions Standards Division, the Director of Stationary Source Compliance Division, and the Associate Enforcement Counsel for Air Enforcement of the EPA Office of Air Quality Planning and Standards (OAQPS). This memorandum was circulated to other air quality officials and EPA regional offices in early March 1990. This latest position states that floor tiles and certain other non-friable materials do not have to be removed from a facility prior to demolition, unless they are severely damaged and thus are considered friable, or unless the demolition may cause fiber release through grinding or abrasion of the tiles. Floor tile removal shall be done if demolition is to be accomplished by burning, either of the unit or of the debris from demolition. However, if the floors in the housing units are to be renovated, special care must be taken during the process to prevent the release of asbestos fibers.

The WESTON field team was directed, as a part of the project scope contained in the SAP, to perform sampling and analysis of specific suspect ACM. Other suspect materials observed were roofing shingles and felt. Copies of the field notes are included in Appendix A.1.

2.3 LABORATORY PROCEDURES AND RESULTS

The bulk samples of building materials were analyzed for asbestos content by WESTON's optical microscopy laboratory in Auburn, Alabama. This laboratory is accredited by the American Industrial Hygiene Association (AIHA) and the National Institute of Standards and Technology (NIST) under the National Voluntary Laboratory Accreditation Program (NVLAP). The bulk samples were analyzed by Polarized Light Microscopy (PLM) using the EPA's "Interim Method for the Determination of Asbestos in Bulk Insulation Samples", EPA 600/M4-82-020, December 1982. Copies of the laboratory reports are included in Appendix A.2.

Vinyl floor tile samples for which no asbestos was found .sing PLM methods and wipe samples of dust accumulated within heating ductwork were analyzed qualitatively for the presence of asbestos by Transmission Electron Microscopy (TEM) at WESTON's NVLAP accredited electron microscopy laboratory in Auburn, Alabama. Copies of these laboratory reports are also included in Appendix A.2.

All analyses were performed in accordance with protocols set forth in the Laboratory Accreditation package submitted by WESTON under NVLAP. This document includes standard procedures for sample analysis

analysis and quality assurance / quality control (QA/QC) which were acceptable to NIST. The QA/QC protocols for the laboratory differ significantly from those commonly found in chemical analysis procedures, due to the nature of the analytical procedure. Since there are no reagents, digestions, or other steps in the process that provide significant opportunities for sample contamination or analyte loss, lot blanks and sample spikes are not performed. Instead, all analyses are performed using the following steps:

- Incoming samples are divided into lots of ten for analysis.
- One sample is selected at random to serve as the QC check and divided into two containers.
- The sample lot is assigned to an analyst who determines the asbestos content of each sample.
- The QC sample is analyzed by a different analyst, designated by the sample custodian.
- The results of both analysts are submitted to the QC Coordinator for review, and comparison to the laboratory QC chart.
- The results are reviewed and approved, based on the written QC review procedures, or rejected. If rejected, the sample lot and QC sample are reanalyzed.

The WESTON laboratory routinely runs blank checks to ensure that equipment and refractive index oils are not contaminated, collects and analyzes samples of the air in the work areas to document that airborne asbestos fibers do not threaten worker health or contaminate samples, and analyzes samples submitted by NIST to document precision of results as required by the NVLAP program. Samples provided in past rounds of proficiency checks are used for analyst training and to document analyst proficiency. The use of third party laboratory comparisons is often done, and is accomplished by sending duplicates of samples to an outside laboratory and comparing the results obtained by the two facilities.

In interpreting the asbestos results, it should be noted that the definition of asbestos presence differs between the EPA and some state agencies. According to the EPA definition, any materials that contain greater than one per cent (>1%) asbestos are classified as ACM by the 1977 NESHAP regulations. However, California has recently implemented state regulations that consider all materials containing 0.1 per cent or more asbestos as asbestos-containing. It is believed that several other states will soon follow the lead of California in lowering the threshold limit to 0.1 per cent, including some in which properties under review in this study are located. Currently, the state of Illinois continues to abide by the EPA definitions, hence, all samples containing >1% asbestos are considered to be ACM.

The matter is further complicated by the fact that the PLM method was developed specifically for friable materials, but not for non-friable types of suspect ACM such as vinyl floor tiles, vinyl sheeting, and siding. In fact, no specific method has been developed and promulgated to date for such samples, so laboratorics use PLM as the only available documented procedure for their analysis. PLM has an inherent limitation on fiber resolution of about 0.25 micrometer (um) in diameter, while reliable detection and quantification of fibers smaller than 1 um in diameter is difficult. The manufacturing process for vinyl floor tiles, for example, often produces the very small fiber diameters which cannot be seen by PLM. WESTON's experience is that frequently such samples do, in fact, contain significant quantities of asbestos. WESTON has developed a qualitative technique using TEM to detect the presence of such small fibers and minimize false

negatives in the laboratory results. This technique, however, does not allow a good quantitative estimate of asbestos content.

For these reasons, the WESTON laboratories have implemented a policy of rejuting asbestos presence as follows:

- Asbestos determined by PLM to be present at greater than 1% is reported as the quantity detected.
- If asbestos is estimated to be less than 1% by PLM, it is reported as "<1%". This estimate of asbestos content may be made when only one asbestos structure is observed.
- If asbestos is not detected in certain non-friable materials by PLM, then the samples are subjected to TEM analysis. The results are reported as positive if asbestos is detected by TEM.

Recommendations made in this report are based on the >1% regulatory limit, except for floor tiles as discussed earlier and except as otherwise noted. However, all samples in which asbestos was detected are discussed. This represents a conservative approach to the assessment of asbestos presence at the facility.

Table 2.1 contains a summary of all samples collected at the Addison FHU, including sample locations, material descriptions, and laboratory results. PLM results are quantitative while TEM results are qualitative. Quantity estimates for materials sampled that were suspected to contain asbestos are presented in Table 2.2. The field notes describing the observations are provided in Appendix A.1, while copies of the original laboratory reports are included as Appendix A.2.

Two of the floor covering samples were found by PLM to contain asbestos at or greater than the 7% level. Three other samples were found by PLM to contain asbestos, but at a concentration of <1%. Three of the samples, for which no asbestos was reported following PLM analysis, was found to contain asbestos fibers by the TEM procedure. While this result is qualitative in nature, consideration of the process through which floor tiles were manufactured which involves the use of very small asbestos fibers invisible to PLM leads to the conclusion that this material should be treated as ACM. Thus, all eight of the floor tile and vinyl sheeting samples were found to contain asbestos. The nine units not inspected should be considered to have ACM present in the floor tiles and vinyl sheeting unless additional sampling and analysis is performed and shows that no asbestos is present in these units.

Analytical results for the dust samples taken from the heater ductwork indicate that this dust contains some asbestos fibers. Qualitative TEM analyses revealed the presence of as estos in nine of the twelve dust samples. At least two samples from each unit had detectable asbestos fibers. This data lead to the conclusion that asbestos is found in the dust trapped by the heating ducts.

TABLE 2.1
BULK SAMPLE SUMMARY
ADDISON FAMILY HOUSING

SAMPLE IDENTIFICATION	MATERIAL TYPE	LOCATION	ASBESTOS CONTENT PLM ANALYSIS	CONFIRMATION TEM ANALYSIS
551225215111511111111111111111111111111	=======================================			=======================================
Unit 006				
BU208-52-11-006-AFT	Gray 12" x 12" floor tile	Kitchen	Chrysotile, <1%	
BU209-52-IL-006-AFT	Brown 12" x 12" floor tile	All bedrooms/Hall/ Bath/Living room	None Detected	Positive
BU210-52-1L-006-ATD	Dust within ductwork	Bedroom 2	•••	Positive
BU211-52-IL-006-ATD	Dust within ductwork	Bath	•••	Positive
BU212-52-IL-006-ATD	Dust within ductwork	Kitchen		Positive
BU213-52-IL-006-ATD	Dust within ductwork	Living room		Positive
Unit 005				
BU214-52-1L-005-AFT	Brown 12" x 12" floor tile	All rooms	Chrysotile, <1%	
BU215-52-IL-005-ATD	Dust within ductwork	Bedroom 3	•••	Positive
BU216-52-1L-005-ATD	Dust within ductwork	Bath		Positive
BU217-52-1L-005-ATD	Dust within ductwork	Kitchen	•••	Positive
BU218-52-IL-005-ATD	Dust within ductwork	Living room		Negative
Unit 001				
BU219-52-1L-001-AFT	Black 9" x 9" floor tile	All rooms	Chrysotile, 7%	
BU220-52-IL-001-AFT	Brown vinyl sheeting	Kitchen	None Detected	Positive
BU221-52-IL-001-AFT	Gray vinyl sheeting	Bath	None Detected	Positive
BU222-52-1L-001-AFT	White floor tile	Bath	Chrysotile, 10%	
BU223-52-1L-001-AFT	Brown floor tile	Bath	Chrysotile, <1%	
BU224-52-1L-001-ATD	Dust within ductwork	Living room	•••	Positive
BU225-52-IL-001-ATD	Dust within ductwork	Kitchen		Positive
BU226-52-1L-001-ATD	Dust within ductwork	Bath		Negative
BU227-52-11-001-ATD	Dust within ductwork	Bedroom 3	•••	Negative

TABLE 2.2 ASBESTOS CONTAINING MATERIALS ADDISON FAMILY HOUSING

SAMPLE MATERIAL TYPE IDENTIFICATION		TERIAL TYPE LOCATION		UNITS	
Init 006					
1U208-52-1L-006-AFT	Gray 12" x 12" floor tile	Kitchen	112	Square ft	
U209-52-1L-006-AFT	•	All bedrooms/Hall/	740	Square ft	
		Bath/Living room			
U210-52-1L-006-ATD	Dust within ductwork	Bedroom 2	N/A		
U211-52-IL-006-ATD	Dust within ductwork	Bath	N/A		
SU212-52-1L-006-ATD	Dust within ductwork	Kitchen	N/A		
SU213-52-IL-006-ATD	Dust within ductwork	Living room	N/A		
Init 005					
U214-52-IL-005-AFT	Brown 12" x 12" floor tile	All rooms	1075	Square f	
U215-52-IL-005-ATD	Dust within ductwork	Bedroom 3	N/A	0400.0	
U216-52-1L-005-ATD	Dust within ductwork	Bath	N/A		
U217-52-IL-005-ATD	Dust within ductwork	Kitchen	N/A		
Unit 001					
U219-52-IL-001-AFT	Black 9" x 9" floor tile	All rooms	1075	Square fi	
U220-52-1L-001-AFT	Brown vinyl sheeting	Kitchen	84	Square fi	
8U221-52-IL-001-AFT	Gray vinyl sheeting	Bath	44	Square fi	
U222-52-IL-001-AFT	White floor tile	Bath	1	Square fi	
U223-52-IL-001-AFT	Brown floor tile	Bath	1	Square f	
U224-52-IL-001-ATD	Dust within ductwork	Living room	N/A	•	
U225-52-IL-001-ATD	Dust within ductwork	Kitchen	N/A		

2.4 CONCLUSIONS AND RECOMMENDATIONS

The sample analyses performed by WESTON have revealed that asbestos is present in all floor tile and vinyl sheeting samples collected in the three housing units examined and that the dust inside the heater supply ducts contains asbestos. These units are thought to be representative of the other nine at the site, but this was not confirmed by sampling all units.

The asbestos dust accumulated within the heating ductwork represents an unusual problem, since the source of this asbestos is not readily apparent, and the quantity is not precisely known. As a conservative approach, the heating ductwork located within the concrete slab should be cleaned or permanently sealed when the units are renovated. Since the heating systems are currently operational, sealing the floor vents will require replacement with attic ducts and ceiling vents, or provisions of an alternate heating source. If the ducts are cleaned, a high-powered vacuum cleaner equipped with a high-efficiency particulate air (HEPA) filter should be employed, since other vacuum cleaners are not capable of trapping all of the small asbestos fibers that may be present.

The source of the asbestos in the ducts cannot be positively determined, due to the sampling and analysis procedures employed. However, there are several potential sources, based on observations at the numerous facilities inspected during this project. Units, presumed to be the original heaters, found at other facilities frequently contained an expansion joint which served to isolate the return air plenum from the heater itself, preventing the transmission of vibrations and noise to the ductwork. The fabric-like material used to form this joint was determined, in some cases, to be chrysotile asbestos in a nearly pure form. It is possible, even likely, that the heating systems in these units had similar expansion joints which have been removed. During the 25 to 30 years that the original units were in service, erosion of these joints was likely, and could have caused asbestos fibers to accumulate in the dust.

Another possibility is that residual debris from the removal of vinyl-asbestos floor tiles, such as was found in other sites, may have been left in the ducts during floor tile removal and replacement. Conversations with the TEM analysis indicate that there was some evidence of chlorine observed during the identification of the asbestos fibers by X-ray dispersion analysis in samples from some sites. The most likely source of this element, considering the site history, is the vinyl chloride polymer which forms the floor tile matrix. However, other asbestos sources, such as debris imported into the facilities from outside activities of the occupants, cannot be ruled out.

Sampling and analysis for airborne asbestos was not performed at this site during the original study due to the lack of an available vacant housing unit during the time of that effort. However, it is recommended by the U.S. Army Environmental Hygiene Agency (AEHA) that, if the units are to remain under the management, operational control, or ownership of the Army, sampling and analysis for airborne asbestos be undertaken. These studies should be performed to provide data from at least ten percent or a minimum of three of the housing units, whichever is greater. This additional sampling and analysis effort, along with the other recommended actions, will help to ensure that there is no long-term exposure risk to the occupants or to maintenance personnel.

The vinyl floor tiles in the three housing units inspected were in good condition, but, should they become broken or damaged, asbestos fibers may be released. The recent EPA clarification of the definition for damaged non-friable materials apparently removes some concerns about the status of these materials at the time of renovation or demolition. Inspection of these normally non-friable materials prior to demolition is required, but, if they are in good condition at the time, they may be left in place as long as planned demolition procedures will not release a significant amount of asbestos fibers. However, if demolition will subject these non-friable materials to grinding, sanding, or abrading, or if demolition involves burning of the structure or debris from the structure, all forms of ACM, including these floor tiles, must be removed in advance.

The vinyl floor coverings should be left in place and managed under an Operations and Maintenance (O&M) program. An O&M program must address the following:

- The locations of all known and suspected ACM.
- The procedures and frequency for periodically assessing the ACM in the facility.
- The procedures for safely handling the ACM during maintenance or removal activities.
- Designation of an asbestos coordinator for the facility.
- The responsibilities and requirements for training of personnel involved with maintenance and renovation of the facility.
- The record-keeping program for the facility.

The vinyl floor coverings should be removed during a planned renovation of the units, in accordance with the regulations applicable at the time.

Other suspect materials noted were roofing shingles and felt, which should be managed under an O&M program. Care should be taken during renovations or demolition to identify suspect materials that may have been hidden from the view of the assessment team. The suspect materials observed by the field team, and any hidden suspect materials found later, should be analyzed for the presence of asbestos prior to being disturbed.

SECTION 3. TRANSFORMER OILS

SECTION 3. TRANSFORMER OILS

WESTON personnel conducted a site visit at the Addison facility on 19 March 1990 to evaluate the potential use of polychlorinated biphenyls (PCBs) in mixtures used as insulating oils in the existing transformers serving the facility. Following inspection of several properties where the condition of the transformers was poor, a protocol was developed to address problems that were being encountered during this activity. Due to the age and deteriorated condition of many of the transformers, collection of samples, in some cases, posed an undue risk of causing environmental damage or exacerbating any that may already exist. If the transformers could not be sampled safely, in the judgement of the field team leader, or if the ownership of the units was in question, the planned sample collection was abandoned and any observations made by the field team were documented.

3.1 SAMPLING RATIONALE

Electrical transformers are often filled with a dielectric liquid which increases the resistance of the unit to arcing and also acts as a heat transfer medium to cool the coils. Many transformers are filled with a chlorinated fire-resistant fluid which meets the definition established in the National Electrical Code for "askarel", the generic name for non-flammable insulating liquids used in transformers. Prior to 1979, transformer askarel typically contained 60 to 100% PCBs. Askarel transformers were made in a variety of sizes containing from three to 3,000 gallons of PCB liquid.

Three types of transformers are defined in the regulations:

- PCB Transformer: Any transformer containing 500 ppm or greater PCBs.
- PCB-Contaminated Transformer: Any transformer containing 50-499 ppm PCBs.
- Non-PCB Transformer: Any transformer containing less than 50 ppm PCBs.

Sampling of transformers is conducted to verify which of these three categories of transformers are present. Depending upon the category determined, certain regulatory requirements including recordkeeping, marking, storage, and disposal must be satisfied.

In general, the sampling protocol followed by WESTON for this project was outlined in ANL's SAP. The plan identified sites where unlabeled, Army-owned transformers were thought to be present. The types, sizes, and precise locations of the transformers were not identified in the plan. Local utility company assistance was needed to identify ownership of the transformers and to provide services necessary to deenergize the high power lines prior to sampling. The objective of this task was to sample all Army-owned transformers serving the facility. However, it was agreed that if the sampling team determined that a spill that may result in environmental damage could occur due to the intrusive effort involved, sampling was not to be attempted. In such cases, name plate information and a general description of the transformer would be obtained. The following list presents potential conditions where sampling activities would not be attempted:

- Transformers are rusted and/or in very poor condition.
- Certain transformer hardware is in poor condition (i.e. drain valves, stopcocks, lid fastening bolts etc.)

- Transformers appear to be in good condition, but access is thwarted by bolts, wing nuts etc.
 that are "rusted shut".
- Transformer and/or transformer mounting pole ownership is questionable or is other than the U.S. Army.

3.2 SAMPLING METHODOLOGY AND OBSERVATIONS

On 21 March 1990, WESTON personnel arrived at the site to conduct transformer sampling activities. Four Army-owned transformers were identified, mounted on individual utility poles. Three devices were located between Army Trail Road and Natoma Avenue while the other transformer is attached to a utility pole behind one of the houses. A Commonwealth Edison Electric Company (CEECO) utility crew was requested to assist with the sampling by de-energizing the high-voltage power feed. In preparation for sampling, WESTON personnel posted both the Health and Safety Plan and the route to the nearest medical center at the work area. The CEECO crew had not arrived at the site by 10:00. Mr. Bill Crutcher of CEECO was contacted and said he had forgotten to notify the crew and may not be able to assist. Despite several telephone conversations and a site visit by Mr. Crutcher, no assistance was provided to de-energize the system to permit safe sampling. The sampling team eventually left the site since no CEECO assistance was forthcoming. Only one of the four transformers could have possibly been sampled, because the other three sampled were in relatively poor condition, but this was not done due to the lack of timely assistance by CEECO.

3.3 CONCLUSIONS AND RECOMMENDATIONS

Four Army-owned transformers that may contain PCBs were identified at the Addison site. One of the transformers appeared to be in a condition that would have permitted an attempt to collect a sample. The condition of the other three devices was such that the sampling could not be safely performed. However, no sample was obtained, despite waiting for over four hours for assistance from the CEECO support personnel. WESTON concludes that the transformers are likely to belong to the PCB-transformer category based on their age. These transformers should be assumed to contain PCBs, based on their age. This fact should be noted in facility records and the devices should be labeled appropriately. Since the transformers were old and their housing are deteriorating, they should be checked periodically as long as they are in service to ensure that no leaks have developed. When these units are replaced with newer transformers that do not contain PCBs, they should be moved to a staging area where they can be opened safely and sampled. A proper area should be capable of containing any oils that may be spilled during the opening and sampling of the transformers until the residues can be cleaned up satisfactorily. The findings of this sampling program should be used to determine the proper disposal method.

SECTION 4. SUMMARY OF FINDINGS

SECTION 4. SUMMARY OF FINDINGS

Sampling and analyses performed at the Addison, Illinois FHU reveal the presence of issues of concern from an environmental standpoint. The most significant are the detection of asbestos in nine of the 12 dust samples and in all of the eight samples of floor tile and vinyl sheeting, and the presence of four transformers which may contain PCBs.

The following practices should be observed with regard to the known and suspected asbestos-containing materials identified:

- The risks posed by the asbestos-containing dust in the ductwork cannot be clearly evaluated, since the program only called for a qualitative screening of this material. Airborne asbestos was not sampled at this site to determine the impact, if any, of asbestos fibers that were detected in the dust deposited in the ductwork of the heating system. During the follow-up study by a WESTON Certified Industrial Hygienist there was no available vacant housing unit in which to collect the necessary samples. Further studies, such as air sampling, are recommended by AEHA to define what risks, if any, are presented by these findings.
- The vinyl floor coverings pose no significant risk as long as they are in good condition and are
 not damaged by excessive wear or misuse. They should be left in place and managed under an
 O&M program which describes procedures for the regular inspection of the floor coverings and
 the removal and replacement of any that become damaged.
- Other suspect materials identified at the site, including roofing materials, should be assumed to contain asbestos and managed in place under an O&M program until they are either removed or determined to contain no asbestos.

Examination of the electrical supply system at the property revealed that four Army-owned transformers which may contain polychlorinated biphenyls (PCBs) are located on the property. The transformers appear to be about 30 years old. They appeared to be in poor-to-fair condition, and efforts were made to collect oil samples from one device. However, the local utility company failed to provide assistance as scheduled, despite several phone calls. Based on the age of the units, WESTON concludes that they are likely to contain PCBs. The units should be assumed to be PCB transformers pending a determination of the PCB content of the oils. This fact should be noted in the facility records and the devices should be appropriately labeled. Upon removal, sampling and analysis should be performed after the transformers are replaced and transported to a facility where the bolts can be removed and the oils sampled safely. The findings of this sampling program should be used to determine the proper disposal method.

APPENDIX A.1. FIELD DATA, ASBESTOS SAMPLING

SITE SURVEY LOG

ON WORK ORDER NO
Un.T 6
TELEPHONE NUMBER
M 1 3 1/ 11
SIGNATURE DATE 27 Fish 9 dd mmm yy
1210 DATE 27 / Feb / 9
y
SULTS & BRIEF DESCRIPTION OF FACILITY
The hit wis could only do
Tor We told her that our
H 4-11 M. M.
Hussing for today. Ms Morton
do unother unit at Addison
to survey Worth.
Sur Charle of Mostro To
Sum Check of West-n Inc.
over a representative range of ser, as indicated by a records check,
few years. There have hen
uses I new turning new routs
-
tyle house with a concrete
sedar shake shingles; the root
covered by ringl thuring while
,
LIST
Number of Samples
Number of Samples 6 Survey Form Completed Ycz
Survey Form Completed Yuy
Survey Form Completed Yoy Site Log Completed Yoy Chain-of-Custody Initiated Yoy Exp. Assess. Form Init. Yoy
Survey Form Completed Yuy Site Log Completed Yuy Chain-of-Custody Initiated Yuy

(Continued)

walls and coilings are painted over planter board. There is also an
with with both lun-in and blown-in fiberglass and cellulose insolution
No insolution would be found in any of the fige runs in the formace
area. Two there tile samples and four hout samples were taken in
this unit! The areas for the closely are included with the rooms in
which the closety occur
The unto originally chosen to survey had to be altered hard on the
availability of acceptants Institut of Unit 6, 10, and 12, we will survey
Units 1 5 and 6 Brad Bailey from Arguna Labs will accompany
while we survey We asked him about the change in survey
plans, and he said that this would not be a proplem as long as
each house was randomly sulested
(We have no except for these units at Addison. It was understood that
we will meet a Syl Benning, at Unit I, who would let us in the
units when we were a lady from Unit to approached us and
said that she had the keys to the vails to be surveyed. She lets
let us into the unite (Unit 6 was her house), then lett. Since Brad
Bally from Argonic Labs was with us we surveyed the units even
the rience from the Housing Dept. was with us.)

ASBESTOS SURVEY DATA

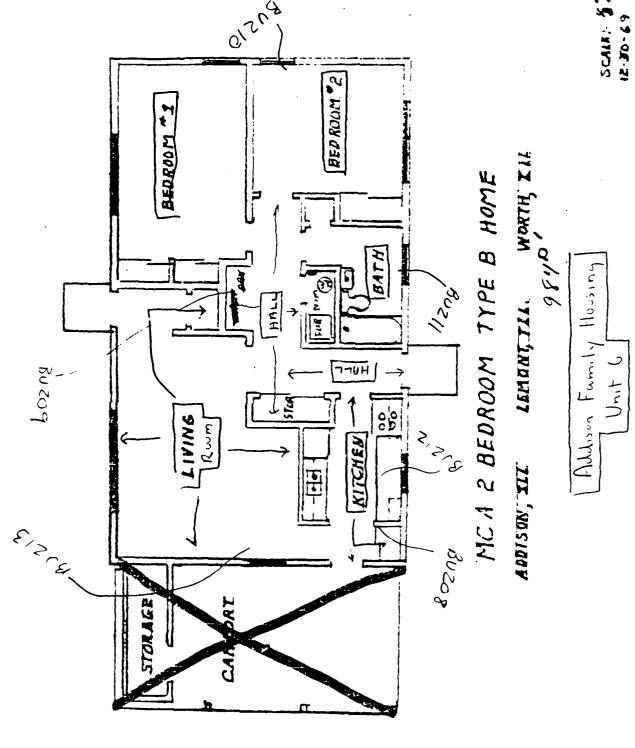
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						* '
BLDG. NO.: INSTALLATION	010161	Michael Kindley Rull Erga		2104-1	13-01 NATIONAL	_ _LAB
	_	hact		I/mm/yy): RIVED: <u>l</u>	<u>21/02/90</u> 1)
TEM LAB SAMPLE BA	SE STATE UNIT NO. SAM	PLE AREA DE	· · · · · · · · · · · · · · · · · · ·	QUANTITY	E.A. FORM NO.	MOTES
2. Provided - 5 3. Brotatio - 5 4. Brotatio - 5 5. Brotatio - 5 6. Brotatio - 5 7. IIII - 1 8. IIII - 1 10. IIII - 1	12-11 UNIS - AIF 12-11 UNIS - AIF 12-11 UNIS - AIT 11 III - AI 11 III - AI 11 III - AI 11 III - AI			7.40 	- 1117131A - 1117131A - 11111 - 11111 - 11111 - 11111	3333311111
NOTE NO.	NOTES/REM	ARKS/COMMENTS/DETAILS/OTHE	ER MATERIALS,	, QUANTIT	Y, ETC.	
01	Gray 12 x1	2' floor tile				
01	Brunn 12" x 12"	floor tile. Also occurs in	Buth Be	Aroon 1	Bedray 2	
	and Living	Rum.				
03	Dust in flu	duds				
						
<u> </u>						
						
						

CHNICIAN ____

CARCON 90 Maruel Kelly

QUALITY ASSURANCE Michael Seo



SITE SURVEY LOG

LIENT Argonne National Labs	WESTON WORK ORDER NO. 2104-13-01
ACILITY/BLDG. NO. Addison Family	Husing Unit 5
CILITY CONTACT Guis Muston	TELEPHONE NUMBER (708) 126-3315
	SIGNATURE Muchael Kulley
CHNICIAN NAME Roll Ergs	SIGNATURE Kolfsiegle
ME ARRIVED 1212	TIME DEPARTED 1235 DATE 27 / Feb/9 dd mmm y
PECIFIC SITE ACTIVITIES, COMMENTS,	INTERVIEW RESULTS & BRIEF DESCRIPTION OF FACILITY
Unit 5 is a three bedroom	Capabart-style house with a warrate
	covered by coder shake shingles, the roof
	The inside is covered by vinyl floring, while
	ented over plaster board. No insulation could
,	pe runs. All were buse. One floor tile
•	taken. The areas for the closets are
	a room in which the closet occurs
	chack bohind the Bath. All the pipes
were bure	14
	let us in the unit, she left while
	of Argenne Labs was in the unit
-	•
with us while the survey w	hrockeding.
	
A	ACTIVITY CHECKLIST
Interviews Completed No.	Number of Samples 5
Drawings Reviewed	Survey Form Completed Yes
rawings Attached You	Site Log Completed Yes
isual Inspection Yes	Chain-of-Custody Initiated Yes
umber of Photos O	Exp. Assess. Form Init. Yes
.A. Check SIGNATURE Mic	
DISTORY SEL. II	AALEX SEAL
ı	CIT TO THE STATE OF THE STATE O

ASBESTOS SURVEY DATA

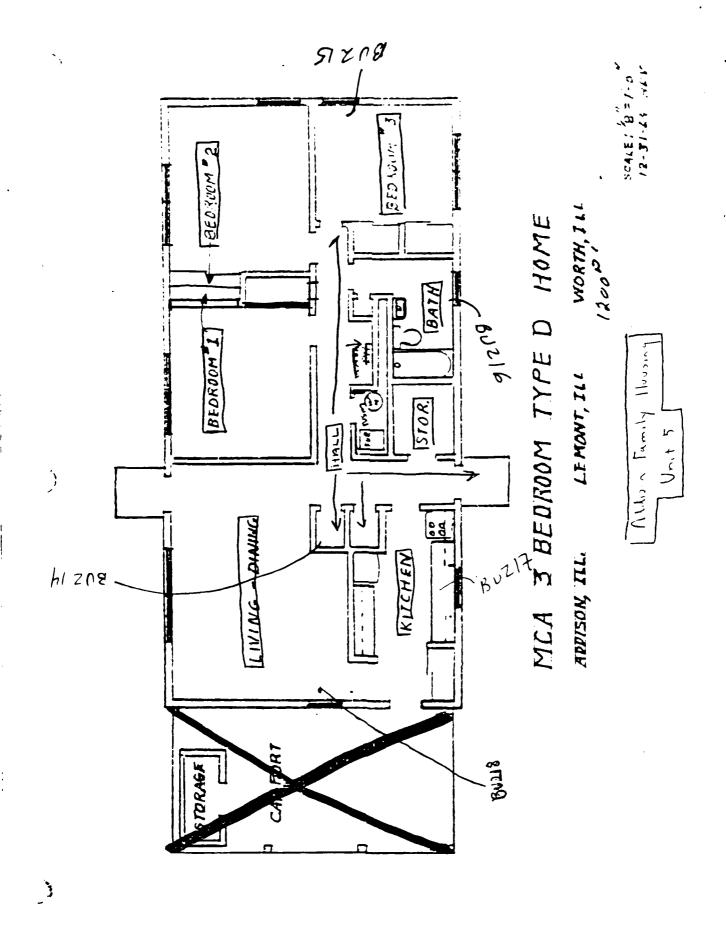
0751

TASK TEAM MEMBERS W.O. No. 2104-13-01 1010 15 1 BLDG. NO .: Michael Kindley INSTALLATION LU 15 12 1 CLIENT: ARGONNE NATIONAL LAB Rolf Ergs BLDG. NAME: Males Fundy Housing Vail 5 DATE (dd/mm/yy): 27/02/90 BLDG. DESCRIPTION: Constant TIME ARRIVED: 1212 E.A. SHE FORM NO. 9 ITEM LAB SAMPLE QUANTITY BASE STATE UNIT NO. SAMPLE 1. BIOIZING -512-11--0015-AIFIT MIAILING COLORDON 10175 - 10175 - 1017318 01 3. | BIVIZING - 512-11- 01015 - ATIO BIRITIES IN THE STATE OF THE ST 5. BIOL4118 -512 - 11- - UNIS - AITIO LINUING ROOM III III 12. _______ NOTE NO. NOTES/REMARKS/COMMENTS/DETAILS/OTHER MATERIALS, QUANTITY, ETC. Brima 12" x 12" floor file. Also in Living Room, Kitchen, Hall Stor Oi Bush Bulrown 1 Betroom 2 and Bedroom 3 Covers whole building essentially 02

ECHNICIAN IGNATURE _

Mahad Killy

QUALITY ASSURANCE Michael Sk SIGNATURE



SITE SURVEY LOG

CLIENT Argonne National Labs	WESTON WORK ORDER NO. 2104-13-01
FACILITY/BLDG. NO. Addison Family House	ung Unit I
FACILITY CONTACT Gale Marten	TELEPHONE NUMBER (7-8) 926 - 3315
TECHNICIAN NAME Muhael Kindley	SIGNATURE My had latery
TECHNICIAN NAME Ruf Erga	SIGNATURE PALLE
	DEPARTED 1317 DATE 27 /Feb/90
	dd mmm yy
SPECIFIC SITE ACTIVITIES, COMMENTS, INTE	RVIEW RESULTS & BRIEF DESCRIPTION OF FACILITY
Unit I is a three bedroom Capen	art-style house with a concrete stab
	codur shake shingles; roof is covered
· 1	I by vinyl floring while the walls
and exiting are privated planter t	
1 '	All pipes were bare. The wester
such closes are included with the	
This was appears to have original of	four tile. The other two units had
1 45.16	not I has older blad- 1 x7" floor
tile. Five samples of vinyl flowing.	and four dut samples were
token	
After letting ve in the unit the	lady from Unit 6 left while we
	Ley from Argonne Labs accompanied
us while we surveyed At 1300	
	unit while we finished our work-
A CENTURAL DESIGNATION OF THE PROPERTY OF THE	my cuncer rom
Interviews Completed No.	TY CHECKLIST Number of Samples 9
Drawings Reviewed N	
Drawings Attached	Site Log Completed Yes
Visual Inspection Yes	Chain-of-Custody Initiated You
Number of Photos	Exp. Assess. form Init.
Q.A. Check SIGNATURE Michael	I Skomicki DATE 21 MAR/90
ADMITORM\SSL. Erm	dd mmm yy
P	Little William

ASBESTOS SURVEY DATA

0755

BLDG. NO .: [0 [0]1] INSTALLATION LUIS 121

TASK TEAM MEMPERS Monhael Kindley Rull Ergn

W.O. No. 2104-13-01 CLIENT: ARGONNE NATIONAL LAB

BLDG. NAME: Addison Family Housing, Unit 1

DATE (dd/mm/yy): 27/06/90

BLDG. DESCRIPTION: Copposit

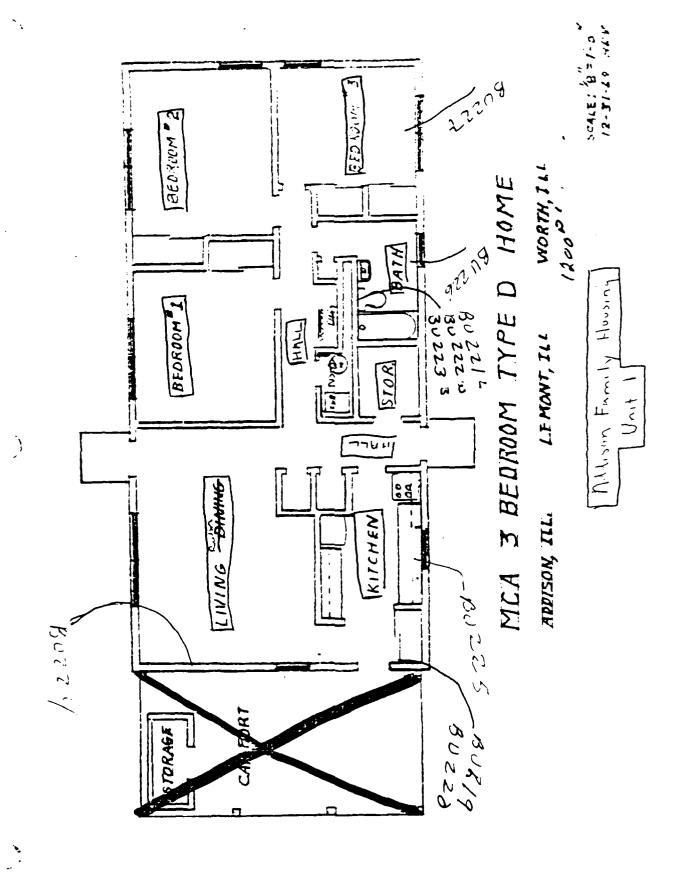
TIME ARRIVED: 1445

ITEM NO.	LAB SAMPLE NO.	BASE STATE UNIT NO.	SAMPLE	AREA	QUANTITY	PH010	E.A. FORM NO.	MOTES	
1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11.	BIOL221 - BIOL221 - BIOL221 - BIOL223 - BIOL23 - B	-512-11- 01011 -512-11- 01011 -512-11- 01011 -512-11- 01011 -512-11- 01011 -512-11- 01011 -512-11- 01011 -512-11- 01011 -512-11- 01011 -11- 11-	- AIFIT - AIFIT - AIFIT - AIFIT - AITID - AITID - AITID - AITID - AITID	BIRITIM I I I I I I I I I I I I I I I I I I	111 111 111 111 111 111 118 118			जिया या श्री अ	
	NOTE NO. NOTES/REMARKS/COMMENTS/DETAILS/OTHER MATERIALS, QUANTITY, ETC.								
	Black 9" x9" Floor tile. Also owners in Hall Living Room, Bath Story Bedruin 1 Bedruin 2 and Bedruin 3. In Kitchen and Bath							1	
	this floor tile lies under Kolled Flooring (linelsum) Essentially								
	02	Brown rul		ring (limborn)					
5	03	1		con (harlern)					
	07	White fi	wr +112	used as paron Couldn't discern	dimens.	<u> </u>	Redlin		
	OF Brown floor file used as particle Dimensions could not be determined without tenring limiters								
	Ųυ	Dost in	. •						
				and the accuracy to					

CHNICIAN GNATURE _

March Kindley

QUALITY ASSURANCE Michael Skofnicki SIGNATURE



APPENDIX A.2. LABORATORY DATA, ASBESTOS SAMPLES

BULK SAMPLE ANALYSIS SUMMARY

Weston W.O. No. 2104-13-01-0000 Sample Number BU208 through Sample BU223

AO LAB					DATE		RES	SUL	ts*	*		
ID NO	CLIENT/CLIENT ID	LOCATION	MATERIAL DESCRIPT	ION	RECEIVED	СН	AM	CR	ОТ	TL	LAYERS	ANALYS1
BU208	52-1L-006-AFT	KITCHN	NF, GY, 12X12 FT		03/05/90	<1	ND	ND	ND	<1	Yes	07323
BU209	52-IL-006-AFT	HALL	NF, BR, 12X12 FT		03/05/90	ND	ND	ND	ND	ND	Yes	07323
BU214	52-1L-005-AFT	HALL	NF, BR, 12X12 FT		03/05/90	<1	ND	ND	ND	<1	Yes	07323
BU219	52-IL-001-AFT	KITCHN	NF, BK, 9X9 FT		03/05/90	7	ND	ND	ND	7	Yes	07323
BU220	52-IL-001-AFT	KITCHN	NF, BR, LINOLEUM		03/05/90	ND	ND	ND	ND	ND	No	07323
BU221	52-IL-001-AFT	BATH	NF, GY, LINOLEUM		03/05/90	ND	ND	ND	ND	ND	No	07323
BU222	52-IL-001-AFT	BATH	NF, WH, FLOOR TILE		03/05/90	10	ND	ND	ND	10	Yes	07323
BU223	52-IL-001-AFT	BATH	NF, BR, FLOOR TILE		03/05/90	<1	ND	ND	ND	<1	Yes	07323
* <u>M</u>	ATERIAL DESCRIPTION	F	P*A: E'		COLOR ²						SYSTEM	3
RESULT CH - CI AM - A	hrysotile OT · Other	r N-	Non-Friable BL BR GR	- Black - Blue - Brown - Green - Gray	TN - Tan WH - Whi	te			DOI HHI STI	4 - 4 -	Chilled N Domestic Heating H Steam Unknown	Water

Joon issue, this report may be reproduced only in full.

All analyses are performed in accordance with the methods set forth in U.S. EPA 600/M4-82-020, as ammended. Weston's Optical Microscopy Laboratory is accredited by the National Institute of Standards and Technology's National Voluntary Laboratory Accreditation Program for asbestos fiber analysis (Laboratory Code 1254).



ROY F. WESTON, INC. 1635 PUMPHREY AVE. AUBURN, AL 36830 PHONE: (205) 826-6100 FAX: (205) 826-8232

Transmission Electron Microscopy Asbestos Summary Report

Client: Argonne National Laboratories Weston W.O. No.: 2104-13-01-0000

Sample Type(s): Dust and Floor Tiles Sampling Location: Addison

QUALITATIVE ANALYSIS

FLOOR TILES: A 0.5 to 2.0 gram portion of each floor tile sample was ultrasonically disaggregated in four milliliters of deionized, 0.2 μm membrane filtered water. After the coarse fraction settled, a drop of the suspended, clay-sized fraction was placed on a Formvar coated 200 mesh Cu TEM grid and allowed to dry. The grid was carbon coated for thermal stability in the electron beam and examined with a Philips CM12 transmission electron microscope operating at 120 kilovolts accelerating voltage.

DUST WIPE SAMPLES: A generous loading of dust was collected on a pre-wetted, 25 square centimeter section of a cleanroom wipe. The wipe was placed in a two ounce wide mouth collection vial and returned to the laboratory. Ten to fifteen milliliters of filtered, deionized water was added to suspend the dust. The suspension was ultrasonically dispersed and the coarse fraction was allowed to settle. A drop of the suspension was placed on a Formvar coated 200 mesh Cu TEM grid and allowed to dry. The grid was carbon coated as above and examined by transmission electron microscopy at 120 kilovolts accelerating voltage.

ANALYTICAL RESULTS

SAMPLE IDENTIFICATION	<u>RESULTS</u>
BU209-52-IL-006-AFT	Positive
BU210-52-IL-006-ATD	Positive
BU211-52-IL-006-ATD	Positive
BU212-52-IL-006-ATD	Positive
BU213-52-IL-006-ATD	Positive
BU215-52-IL-005-ATD	Positive



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ANALYTICAL RESULTS

(continued)

SAMPLE IDENTIFICATION	RESULTS
BU216-52-IL-005-ATD	Positive
BU217-52-IL-005-ATD	Positive
BU218-52-IL-005-ATD	Negative
BU220-52-IL-001-AFT	Positive
BU221-52-IL-001-AFT	Positive
BU224-52-IL-001-ATD	Positive
BU225-52-IL-001-ATD	Positive
BU226-52-IL-001-ATD	Negative
BU227-52-IL-001-ATD	Negative
//	
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regnall	4/6/90
(Approved for Transmittal)	/ (Date)
	/

* This test report relates only to the specific items tested.

** These sample results may only be reproduced in full, and are valid only if approved for transmittal.

APPENDIX B. FIELD DATA, TRANSFORMER EVALUATIONS

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-BEN Shapiro - Holding times For LUSS

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1312 - ALRIVED AT ADDISM SITE

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ULINDS Trail Romo & NATIONA HER

ARM Trail Romo & NATIONA HOE

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Natony The

- unly one looks in deept strage

3-21-90 - Addison, ILC -Arrived AT 0915 For (930 Scheduled meeting 1000. No one Franquer corpany shows Aurora 0.3+ 844-6211 627-5500 Lindalale Bill Crichet 691-4412 1020 - Finally got shold of Mr. Contider who said that he fugot about it 9 might not be ADE to get A truck today 11:15 · Met Bill Gutchert (con.eu) at the Site; he needed the information on the poles 4 transformers. I Ar to call him back in & 15 min 1130 TALKED to Bill again. He sais that Spreame may be but the ste in approximately one bur. I madional the fact that I have a plane to atch & to try to get someone at 95 soon as possible 1315 Lept size Mossners + 3657 100 Corp North Side 101 PT 209 Lareside Dr 60015 (312 298-602)

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